IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

JOHN MICHAEL VAN BUITEN and IRON WORKERS MID-SOUTH PENSION FUND, Individually and on Behalf of All Others Similarly Situated,))))
Plaintiffs,)
v.)))
DELL INC., MICHAEL S. DELL, ALEX J.) CASE NO.: 4:13-cv-01585
MANDL, DONALD J. CARTY, KLAUS S.)
LUFT, WILLIAM H. GRAY, III, JAMES W.) UNOPPOSED
BREYER, SHANTANU NARAYEN, H.)
ROSS PEROT, JR., GERARD J.)
KLEISTERLEE, JANET F. CLARK,)
LAURA CONIGLIARO, KENNETH M.)
DUBERSTEIN, SILVER LAKE PARTNERS,)
L.P., DENALI HOLDING INC., DENALI)
INTERMEDIATE INC., and DENALI)
ACQUIROR INC.,)
Defendants.)) _)

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' COMPLAINT AND FILE A CERTIFICATE OF INTERESTED PARTIES

WHEREAS, Plaintiffs John Michael Van Buiten and Iron Workers Mid-South Pension Fund ("Plaintiffs") filed their Complaint for Breach of Fiduciary Duties and Violation of Federal Securities Laws (the "Complaint") on May 30, 2013 naming as defendants Dell Inc. ("Dell"), Silver Lake Partners, L.P., Denali Holding Inc., Denali Intermediate Inc., Denali Acquiror Inc., and the Director Defendants¹ (collectively, "Defendants");

Michael S. Dell, Alex J. Mandl, Donald J. Carty, Klaus S. Luft, William H. Gray, III, James W. Breyer, Shantanu Narayen, H. Ross Perot, Jr., Gerard J. Kleisterlee, Janet F. Clark, Laura Conigliaro and Kenneth M. Duberstein are collectively referred to as the "Director Defendants."

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WHEREAS, Dell's deadline to answer, move, plead, or otherwise respond is July

30, 2013, and the remaining Defendants' deadline to answer, move, plead, or otherwise respond

is August 5, 2013;

WHEREAS, by the Court's Order for Conference and Disclosure of Interested

Parties dated May 31, 2013, counsel is ordered to file a Certificate of Interested Parties within 15

days from the receipt of such order;

IT IS HEREBY STIPULATED by and among the undersigned counsel, subject to

the Court's approval, as follows:

1. Defendants shall answer, move, plead, or otherwise respond to Plaintiffs'

Complaint by August 30, 2013.

2. Defendants shall file a Certificate of Interested Parties by August 30,

2013.

3. The filing of this stipulation shall be without prejudice to, and shall not

constitute a waiver of, any claim, defense or plea by any party hereto.

* * *

SO ORDERED:

DATED: July ____, 2013.

THE HONORABLE MELINDA HARMON

UNITED STATES DISTRICT JUDGE

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Agreed to:

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Certificate of Service

I her	eby certify	that a true ar	nd correct	copy of the	ne foregoin	g has been	served u	ıpon al
counsel of re	ecord by ele	ectronic servi	ice and/or	e-mail, o	n this 26th	day of July	, 2013.	

/s/ David D. Sterling
David D. Sterling